

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA (Charleston)**

In Re:

Frank Scott Dabney and Kathryn
Harrelle Dabney

Debtors.

Frank Scott Dabney and Kathryn Harrelle
Dabney,

Plaintiffs,

v.

Bank of America, N.A.; Specialized Loan
Servicing, LLC; Shellpoint Mortgage Servicing;
and The Bank of New York Mellon,

Defendants.

Case No. 13-04227-JW
Chapter 13

Adversary Proceeding No.: 17-80037-JW

DEFENDANT BANK OF AMERICA, N.A.'S
MOTION FOR EXTENSION OF TIME

Pursuant to Rule 9006 of the Federal Rules of Bankruptcy Procedure, Defendant Bank of America, N.A. ("Defendant"), by and through counsel, hereby moves this Court for an extension of time to respond to: Plaintiff's First Set of Interrogatories to Bank of America, N.A., Plaintiff's First Set of Requests for Production to Bank of America, N.A., and Plaintiff's First Set of Requests for Admission to Bank of America, N.A. until April 26, 2019. In support of this Motion, Defendant states the following:

1. Defendant was served with Plaintiff's First Set of Interrogatories to Bank of America, N.A., Plaintiff's First Set of Requests for Production to Bank of America, N.A., and Plaintiff's First Set of Requests for Admission to Bank of America, N.A. on March 6,

2019.

2. Defendant's deadline to respond to Plaintiff's First Set of Interrogatories to Bank of America, N.A., Plaintiff's First Set of Requests for Production to Bank of America, N.A., and Plaintiff's First Set of Requests for Admission to Bank of America, N.A. is April 5, 2019. Accordingly, the deadline for Defendant to respond has not yet expired.
3. Defendant has not previously request an extension of time to respond to Plaintiff's Plaintiff's First Set of Interrogatories to Bank of America, N.A., Plaintiff's First Set of Requests for Production to Bank of America, N.A., and Plaintiff's First Set of Requests for Admission to Bank of America, N.A.

WHEREFORE, Defendant respectfully requests that this Court enter an Order Granting Defendant an extension up to and including April 26, 2019 to respond to Plaintiff's Plaintiff's First Set of Interrogatories to Bank of America, N.A., Plaintiff's First Set of Requests for Production to Bank of America, N.A., and Plaintiff's First Set of Requests for Admission to Bank of America, N.A.

Respectfully submitted on this 21st day of March, 2019.

By: /s/ Trent M. Grissom
Trent M. Grissom (Federal Bar No. 10671)
McGUIREWOODS, LLP
Fifth Third Center
201 North Tryon Street, Suite 3000
Charlotte, North Carolina 28202
Telephone: (704) 343-2162
Facsimile: (704) 444-8819
tgrissom@mcguirewoods.com
Attorney for Defendant Bank of America, N.A.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 21st day of March, 2019, a copy of the foregoing *Motion for Extension of Time* for Defendant Bank of America N.A. was served electronically with the Clerk of Court using the CM/ECF system, which sent notification of such filing to all counsel of record, or by mailing a copy thereof, first class U.S. mail, postage prepaid to the following:

Jason Scott Luck
Garrett Law Offices, LLC
1075 E. Montague Avenue
North Charleston, SC 29405
JLuck@Garrettlawsc.com
Attorneys for Plaintiffs
Frank Scott Dabney and
Kathryn Harrelle Dabney

Damon C. Wlodarczyk
Riley Pope & Laney, LLC
PO Box 11412
Columbia, SC 29211
damonw@rplfirm.com
Attorneys for Defendants
Shellpoint Mortgage Servicing
and The Bank of New York Mellon

Jason S. Luck
Garrett Law Offices, LLC
1075 E. Montague Ave.
North Charleston, SC 29405
jluck@garrettlawsc.com
Attorney for Plaintiffs

Robert Varnado
Brown & Varnado, LLC
103 Church Street
Mt. Pleasant, SC 29464
RVarnado@Brown-Varnado.com
Attorneys for Plaintiffs
Frank Scott Dabney and
Kathryn Harrelle Dabney

Graham S. Mitchell
Nelson Mullins Riley and Scarborough LLP
1320 Main Street
17th Floor
P.O. Box 11070 (29211)
Columbia, SC 29201
graham.mitchell@nelsonmullins.com
Attorneys for Defendant
Specialized Loan Servicing, LLC

/s/ Trent M. Grissom
Trent M. Grissom